

**IN THE UNITED STATES COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION**

HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY,)	Case No. 1:10-cv-01955-MBS
)	
)	
Plaintiff and Stakeholder in Interpleader)	
)	
v.)	DEFENDANT WILSON SMITH,
)	JR.'S ANSWERS TO
)	INTERROGATORIES PURSUANT
WILSON SMITH, JR., LAUREN SMITH)		TO LOCAL RULE 26.01
LARSON SMITH, WILSON SMITH III,)		
ARTHUR W. RICH, as Special)		
Administrator of the Estate of ANN FOX)		
SMITH,)	
)	
Defendants and Claimants in Interpleader)		
)	
_____)	

Defendant Wilson Smith, Jr., through counsel, responds to the
Interrogatories pursuant to Rule 26.01 of the Local Civil Rules of the United States
District Court for the District of South Carolina as follows:

Interrogatory No. 1:

State the full name, address and telephone numbers of all persons or legal entities
who may have a subrogation interest in each claim and state the basis and extent of said
interest.

Answer: None.

Interrogatory No. 2:

As to each claim, state whether it should be tried jury or non-jury and why.

**Answer: This case should be tried non-jury based upon the equitable nature
of this claim.**

Interrogatory No. 3:

State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Answer: Not applicable.

Interrogatory No. 4:

State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Answer: Defendant Wilson Smith, Jr. resides in Aiken, South Carolina.

Interrogatory No. 5:

Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: This defendant is not aware of any related matter filed in this District pending at this time.

SIMMONS LAW FIRM, LLC

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November 18, 2010